

JEFFERSON COUNTY HUMAN SERVICES DEPARTMENT

CODE OF ETHICAL CONDUCT

MISSION AND VISION STATEMENTS

Mission Statement

Enhance the quality of life for individuals and families living in Jefferson County by addressing their needs in a respectful manner, and enable citizens receiving services to function as independently as possible, while acknowledging their cultural differences.

Vision Statement

All citizens have the opportunity to access effective and comprehensive human services in an integrated and efficient manner.

PURPOSE OF CODE OF ETHICAL CONDUCT

This Code of Ethical Conduct is integral to JCHSD commitment to provide high quality care with honesty and integrity. The Code of Ethical Conduct articulates the basic values, ethical principles and standards of JCHSD. When individuals become part of JCHSD, their conduct is expected to reflect the Department's and County's values. All employees (full time, part-time and LTE's), interns, volunteers, contractors, network providers and other designated individuals acting on JCHSD behalf are required to comply with the letter and spirit of the Code of Ethical Conduct.

The Code of Ethical Conduct is intended to:

- Communicate expectations and guidelines for professional and ethical behavior and business practices.
- Familiarize all staff and others acting on behalf of JCHSD with the basic legal principles, compliance and ethical standards of behavior expected throughout JCHSD.
- Assist staff to identify relevant considerations when ethical and compliance situations arise.
- Demonstrate JCHSD dedication to quality care and commitment to comply with laws, regulations, contractual obligations, policies and procedures and ethical standards.
- Assure everyone associated with JCHSD shares the commitment to maintaining the high standards of business and ethical conduct set forth by JCHSD.

The Code of Ethical Conduct is intended to complement, not replace, County and Department policies and procedures or other professional codes required as part of licensure or certification. The absence of an explicit reference to a specific behavior or situation does not mean the behavior is ethical or unethical. The standards are not meant to be exhaustive. Rather, the Code of Ethical Conduct provides guidance for decision-making and conduct when ethical issues arise. More specific guidance is provided in JCHSD Policies and procedures. If there is not an existing Department or County policy on a particular subject matter, the general principles of this Code of Ethical Conduct are to be used as a guideline.

Staff, contractors and others representing JCHSD who are uncertain about the ethics of a particular course of action must seek counsel from their supervisor or other management staff within their chain of command. Employees may also contact the JCHSD Director or Compliance Officer.

A Code of Ethical Conduct cannot guarantee ethical behavior. Nor can it resolve all the ethical issues and capture the complexity of the many moral decisions that arise. Each employee and contractor must take personal responsibility to perform their duties in good faith and in a manner they reasonably believe to be in the best interest of JCHSD and the public it serves.

The term “we,” as used in this document, refers to JCHSD employees, volunteers, contractors, network providers, board members, interns and other individuals authorized to act as representatives of JCHSD, both inside and outside the Department’s facilities.

Questions regarding the Code of Ethical Conduct should be directed to Barb Mottl, the Compliance Officer, at 920-674-3105.

STANDARD OF ETHICAL CONDUCT

QUALITY OF CARE & SERVICE

We are committed to providing high quality, caring, ethical and professionally competent behavioral health services to our consumers and their families, our constituents and the community.

We:

- Apply sound behavioral health principles in our daily work and activities with an emphasis on evidence based practices.
- Participate in activities that promote quality improvement and bring deficiencies to the attention of those who can assess and resolve the problems.
- Treat consumers and constituents in a manner appropriate to their background, culture, religion and heritage and are mindful of individual differences.
- Do not deny care on the basis of race, gender, religion, creed, color, economic status, sexual orientation, disability, marital status, age, or any other discriminatory characteristic.
- Conform to the *Code of Ethical Conduct* and standards of our respective professions.
- Ensure that the source or amount of payment for consumer services shall not affect the quality of care or service.
- Provide consumers with the information needed to make fully informed decisions.
- Consumers have the right to receive information about JCHSD services, policies, procedures, fees, network provider list, and confidentiality requirements. Consumers are made aware of their treatment options, goals, and expected length of care.
- Strive to enhance consumers' capacity and opportunity to change and address their own needs by including them in developing treatment goals and plans to every extent possible.
- Provide competent services within the boundaries of our education, training, license, certification, consultation received, experience or other relevant professional experience.
- Document all consumer service encounters in the JCHSD' records accurately, completely and timely following established documentation guidelines.

WORKPLACE CONDUCT

We ensure our work environment supports high standards of professional behavior and promotes dignity, integrity, fairness, respect, teamwork and safety.

We:

- Respect the basic rights, dignity and values of consumers and staff including, but not limited to, race, color, religion, gender, sexual orientation, age, national origin, economic condition and disability.
- Use work hours to accomplish County duties and assignments in a productive and professional manner.
- Promote a positive image for JCHSD, its employees and services.

- Take personal responsibility for performing duties in good faith and exercise sound judgment.
- Strive for positive and cooperative relationships within JCHSD by treating our colleagues with respect, dignity, fairness and courtesy.
- Maintain a working environment free from all forms of harassment or intimidation – verbal, sexual, or otherwise. Discriminatory treatment, abuse, violence or intimidation is not tolerated.
- Comply with work and safety policies in accordance with County and JCHSD policies including, but not limited to, the mandated non-smoking ordinance in and near County buildings and vehicles as well as the drug and alcohol policy prohibiting the use of alcohol or illicit drugs in the workplace. Over-the counter medications and prescriptions ordered by a physician are used in dosage and frequency described on the medication or package insert unless specified otherwise by the prescribing physician.
- Cooperate in achieving JCHSD commitment to maintain a work environment that promotes the prevention, detection, and resolution of conduct that does not conform to codes of ethics and standards of JCHSD and our respective professions.
- Require staff who oversee or supervise the work of others to 1) provide clear direction about what is expected of them regarding both job responsibilities and workplace conduct and 2) ensure no employee is required to compromise their professional integrity, standards, judgment or objectivity in the performance of their duties.

STAFF-CONSUMER RELATIONSHIPS

We are committed to providing services by qualified staff that are compassionate, courteous, culturally competent, fiscally responsible and ethical.

We:

- Conduct ourselves in a manner that shows concern and respect for the dignity of consumers treating them in a manner appropriate to their background, culture, religion and heritage. The welfare of consumers and their families is placed above all other concerns unless one's safety is threatened.

- Do not take unfair advantage of the professional relationship with current or former consumers or exploit them to further our personal, religious, political, social or business interests. Dual or multiple relationships where there is a risk of exploitation or potential harm to the consumer are prohibited for two years after a consumer is discharged from services or the date of the last professional contact.
- Understand that in the course of events, there is the possibility a dual relationship may be discovered and/or is unavoidable. In such instances, the details of the relationship and any potential conflicts will be immediately disclosed to the supervisor for guidance regarding the conflict. We are responsible to set clear, appropriate, and culturally sensitive boundaries.
- Respect consumers' right to privacy and protect consumers' confidentiality by adhering to all rules, regulations, and professional practices and standards of privacy and confidentiality. We avoid discussing confidential information in public or semipublic areas such as hallways, front/reception desk, waiting rooms, rest rooms, elevators and restaurants. Confidential information is never used for personal benefit or the benefit of any other person.
- Do not knowingly disclose confidential consumer information without express written consent of the consumer or pursuant to court order and in accordance with the applicable law. Confidential information may be shared under certain circumstances in accordance with Federal and State regulations.
- Provide consumers with reasonable access to their medical records following policy based on regulations. Where there is concern a consumer's access to his/her record could cause misunderstanding or harm, clinical staff assist the consumer in interpreting the records.
- Do not involve consumers, families or other service providers in criticism or controversy related to internal policies, practices, staff actions or personalities. In no case is this information ever part of the medical record.

ADHERING TO LAWS AND REGULATIONS

We follow the letter and the spirit of applicable laws and regulations and conduct business ethically and honestly.

We:

- Comply with all applicable laws, rules, regulations, standards and other requirements of the federal mental health care and alcohol and drug program statutes, regulations, and guidelines.
- Do not engage in any practice that involves unethical or illegal activity. If unsure of the meaning or application of a statute, regulation, policy or legality, we seek guidance from our supervisor or the Compliance Officer.
- Strive to ensure no false, fraudulent, inaccurate or fictitious claims for payment or reimbursement of any kind are submitted. These claims include, but are not limited to time cards/reports, travel claims, Progress notes, claims and cost reports.
- Take reasonable precaution to ensure billing and coding of claims are prepared and submitted accurately, timely and are consistent with federal, state and local laws and regulations as well as JCHSD policies and procedures and/or agreements with third party payors. This includes federal health care program regulations and procedures or instructions otherwise communicated by regulatory agencies such as the Centers for Medicare and Medicaid Services or their agents.
- Bill only for eligible services actually rendered, reported to the .25 minute and fully documented. When services must be coded, we use only billing codes that accurately describe the services provided.
- Act promptly to investigate and correct problems if errors in claims or billings are discovered.
- Voluntarily disclose to third party law enforcement or regulatory agencies violations of law, regulations or standards during investigations, audits and other situations where appropriate and legally required.
- Do not intimidate, threaten, coerce, discriminate against, nor take other retaliatory reaction against any consumer, constituent, contractor or employee who exercises the right to file a complaint or who participates in an investigation or proceeding relative to a complaint.

CONFLICTS OF INTEREST

We avoid conflicts of interest or the appearance of conflicts between our own personal interests and the best interests of the Department and the County.

We:

- Avoid commitments that interfere with our ability to properly perform our duties for JCHSD or any activity that conflicts with the known interest of JCHSD, its consumers or constituents. Examples include, but are not limited to: 1) the use of County time, facilities or equipment for private gain or advantage for oneself or another; 2) the solicitation of future employment with a company doing business with JCHSD over which the employee has some control or influence in his/her official capacity.
- Report any potential conflicts of interest for ourselves or others to the appropriate supervisor, manager or Compliance Officer.
- Prohibit individual staff in private practice from referring consumers to themselves or actively engaging in any relationship with other staff to promote referrals to their private practices.
- Do not accept or provide any gift of more than nominal value or any hospitality or entertainment, which, because of its source or value, might influence independent judgment in transactions involving JCHSD.
- Voluntarily disclose to our immediate supervisor or the Compliance Officer any financial interest, official position, ownership interest or any other relationship an employee or member of his/her immediate family has with JCHSD vendors, contractors or referral sources.

EXTERNAL RELATIONSHIPS

We continually strive to honor, uphold and promote the public trust in all our activities.

We:

- Carry out our duties in a way that encourages participation and access to JCHSD programs and resources and that enhances the Department's standing in the community.
- Are honest and forthright in providing information to consumers, vendors, payors, other agencies and the community within the constraints of privacy and confidentiality requirements and as allowed by law.

- Seek helpful and cooperative relationships with external agencies and community groups to enhance services and resources available to the public.
- Ensure all legally required reports or other information provided to any external entity including federal, state and local government agencies are accurate and submitted timely. Only authorized staff or their official designee sign reports requiring certifying signatures.

RECORDS MAINTENANCE

We are conscientious in maintaining accurate and appropriate records in accordance with all federal, state and local laws and regulations and JCHSD policies and procedures.

We:

- Maintain complete, accurate, current and thorough records stored in secure locations and made available only to those authorized to have access.
- Abide by professional, legal and ethical codes governing confidentiality to ensure all records in any medium and at all service locations are maintained in a manner to protect employee and consumer privacy rights and to provide factual information.
- Maintain, train and monitor adherence to documentation and record keeping guidelines following legal requirements. Records are maintained for at least the minimum period required by laws and regulations.